

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 11
	:	
SCUNGIO BORST & ASSOCIATES, LLC.	:	
	:	BANKR. NO. 22-10609 (AMC)
	:	
Debtor.	:	

**LIMITED OBJECTION OF THE UNITED STATES TRUSTEE TO THE DEBTOR'S  
MOTION FOR AN ORDER AUTHORIZING THE RETENTION AND EMPLOYMENT  
OF BOCHETTO AND LENTZ AS SPECIAL COUNSEL**

Andrew R. Vara, the United States Trustee for Region 3 (“U.S. Trustee”), by and through his undersigned counsel, hereby offers the following Limited Objection (this “Objection”) to the Motion of the Debtor to employ Bochetto & Lentz as Special Counsel, (the “Application”). In support of the Objection, the U.S. Trustee states as follows:

1. On April 5, 2022, the Debtor filed the Application to employ Bochetto & Lentz, as special counsel..
2. Among other things, the Application seeks to reimburse Bochetto & Lentz out of pocket expenses without court approval.
3. Both the Application and its attached proposed order (the “Proposed Order”) would allow for the payment of out-of-pocket expenses without the necessity of filing fee applications in accordance with Sections 330 and 331 of the Bankruptcy Code.
4. However, payment of the expenses constitutes interim compensation, is subject to further review by the Court, and must also be approved on a final basis.

5. The Trustee opposes the entry of Debtor's proposed Order to the extent it provides for payment of out-of-pocket expenses without prior court approval; hence the Court should strike paragraph 4 of the proposed order.

WHEREFORE, the U.S. Trustee respectfully requests that the trustee's Proposed Order be denied as presented, and that paragraph 4 be stricken therefrom; and that the Court grant such other and further relief as is just under the circumstances.

Dated: April 13, 2022

Respectfully submitted,

ANDREW R. VARA  
United States Trustee  
For Regions 3 and 9

By: /s/ George M. Conway  
George Conway, Trial Attorney  
United States Department of Justice  
Office of The United States Trustee  
Custom House, 200 Chestnut Street,  
Suite 502  
Philadelphia, PA 19106  
Phone: 215 597 8418  
george.m.conway@usdoj.gov